

1 Geraldine A. Wyle (SBN 89735)
2 Jeryll S. Cohen (SBN 125392)
3 Jeffrey D. Wexler (SBN 132256)
4 **LUCE FORWARD HAMILTON & SCRIPPS LLP**
5 601 South Figueroa, Suite 3900
6 Los Angeles, California 90017
7 Telephone: (213) 892-4992
8 Facsimile: (213) 892-7731

9 Attorneys for James P. Spears,
10 Temporary Conservator of the Person and
11 Temporary Co-Conservator of the Estate

12 Andrew M. Wallet (SBN 93043)
13 Rebekah E. Swan (SBN 186307)
14 **HINOJOSA & WALLET**
15 2215 Colby Avenue
16 Los Angeles, California 90064
17 Telephone: (310) 473-7000
18 Facsimile: (310) 473-1730

19 Attorneys for Andrew M. Wallet,
20 Temporary Co-Conservator of the Estate

21 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
22 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

23 In re the Conservatorship of the Person and the
24 Estate of:

25 **BRITNEY JEAN SPEARS,**
26
27 Temporary Conservatee.

CASE NO. BP 108870

**EX PARTE APPLICATION FOR ORDER
GRANTING PROTECTIVE ORDER
AGAINST DEPOSITION OF
TEMPORARY CONSERVATEE BRITNEY
SPEARS IN FLORIDA ACTION;
MEMORANDUM OF POINTS AND
AUTHORITIES**

Date: October 28, 2008
Time: 8:30 a.m.
Department: 9
Judge: Hon. Reva Goetz, Judge Pro Tem

1 PLEASE TAKE NOTICE that James P. Spears ("Mr. Spears") as temporary conservator
2 of the person and temporary co-conservator of the estate of Britney Jean Spears and Andrew M.
3 Wallet ("Mr. Wallet") as temporary co-conservator of the estate of Britney Jean Spears will, and
4 hereby do, respectfully apply to the Court *ex parte* for an Order providing that Wright
5 Entertainment Group, LLC and Wright Entertainment Group, Inc. (collectively, the "Florida
6 Plaintiffs") may not take the deposition of temporary conservatee Britney Jean Spears
7 ("Britney") in a lawsuit (the "Florida Action") brought by the Florida Plaintiffs in Florida, unless
8 and until this Court terminates the conservatorship or enters an Order finding that Britney is able
9 to be deposed, whichever is earlier.

10 This application is based on this Application, the Memorandum of Points and Authorities
11 attached hereto, the Declaration of Jeryll S. Cohen filed concurrently herewith, the [Proposed]
12 Order lodged concurrently herewith, and such argument as may be presented in connection with
13 the Application.

14 As set forth in the Declaration of Jeryll S. Cohen filed concurrently herewith, Messrs.
15 Spears and Wallet: (1) gave notice of this Application to Clay Townsend of Morgan & Morgan,
16 P.A., counsel for the Florida Plaintiffs, in telephone conversations on October 21, 2008 and
17 October 23, 2008; and (2) gave notice of this Application to Samuel Ingham III, PVP counsel for
18 Britney, on October 21, 2008 and October __, 2008. Mr. Townsend stated that he opposes the
19 Application and will appear at the hearing on the Application. Mr. Ingham stated that he
20 consents to the Application and will appear at the hearing on the Application.

21 Respectfully submitted,

22 DATED: October __, 2008

LUCE, FORWARD, HAMILTON & SCRIPPS LLP

24 By:

25 Jeryll S. Cohen
26 Attorneys for Temporary Conservator of the Person and
27 Temporary Co-Conservator of the Estate James P.
28 Spears

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: October __, 2008

ANDREW M. WALLET

By: _____
Andrew M. Wallet
Temporary Co-Conservator of the Estate